



State of Ohio Environmental Protection Agency
Northeast District Office

0 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

September 3, 2003

RE: US. TECHNOLOGY CORP.
OHD 046 631 743
STARK COUNTY

Raymond Williams
U.S. Technology Corporation
1446 W. Tuscarawas Street
Canton, OH 44702

Dear Mr. Williams:

On August 13, 2003, Ohio EPA received your fax requesting Ohio EPA confirm the amount of spent blasting media U.S. Technology is required to recycle by December 31, 2003. US Technology had 1,472,000 lbs of spent blasting media (SBM) at its facilities in Canton, Ohio on January 1, 2003. According to Ohio Administrative Code 3745-51-01(C)(8) US Technology is required to recycle seventy-five percent by weight or volume of the amount of the SBM accumulated at the beginning of the calendar year. Therefore, US Technology would need to recycle at least 1,104,000 lbs of SBM by December 31, 2003.

Should you have any questions, please feel free to call me at (330) 963-1272. You can find copies of the rules and other information on the Division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,

Nyall McKenna
Environmental Specialist
Division of Hazardous Waste Management

NM:ddw

ec: Natalie Oryshkewych, DHWM, NEDO
cc: Tammy McConnell, DHWM, CO
Jeff Mayhugh, DHWM, CO
Harry Sarvis, DHWM, CO
Michael Cunningham, USEPA, Region 5, Office of RCRA (HRE-8J)
Steve Bailey, Mississippi DEQ, Env. Compliance and Enforcement Division

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

April 22, 2003

Mr. Ray Williams
US Technology Corporation, Inc.
1446 West Tuscarawas Street
Canton, Ohio 44702

Re: Clarification of Ohio EPA's February 26, 2003 letter

Dear Mr. Williams:

As we discussed in our telephone conversation on April 17, 2003, I'm writing this letter to provide clarification of Ohio EPA's letter, written by Karen Hale dated February 26, 2003. That letter concerned use of spent blasting media (SBM), exhibiting the characteristic of toxicity for hazardous heavy metals constituents, as an ingredient in manufacturing concrete block.

The regulation addressing the exclusion of hazardous waste from being waste [Ohio Administrative Code (OAC) rule 3745-51-02(E)] is self-implementing. This means that no approval is required from Ohio EPA in order for you to receive material that meets the conditions of the exclusion.

Based upon the information you have provided us, and the criteria listed below, we do not consider the SBM to be a waste and therefore receipt and storage of the SBM would not require you to obtain a hazardous waste permit. The criteria listed below do not constitute conditions which must be met prior to your receipt and storage of SBM. Rather, the criteria are on-going requirements which you must maintain and readily demonstrate at all times for the continued exclusion of the SBM from the definition of waste under Ohio's hazardous waste rules. The criteria for continued exclusion of the SBM that you will use in your manufacturing process are:

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

- The number of containers and weight of SBM, meeting material specifications, received by US Technology from each generator by date;
- The number of containers and weight of SBM, not meeting material specifications, received by US Technology from each generator by date and the disposition of the off-specification SBM;
- Per operating day, the weight of SBM used and the total number of concrete blocks produced containing SBM;
- The total number of off-specification blocks containing SBM produced per day and the disposition of the blocks;
- Name and address of each buyer of SBM block, the date of sale, and the total number of concrete block sold to that buyer; and,
- Documentation that SBM concrete blocks meet your product specifications and ASTM industry specifications.

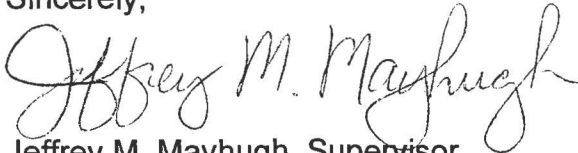
It is important to point out that according to OAC rule 3745-51-02(E)(2)(a) materials are wastes, even if recycling involves use or reuse, if the material is used in a manner constituting disposal, is used in products that are applied to the land or is accumulated speculatively, as defined in OAC rule 3745-51-01(C)(8).

With regard to continued analysis of the concrete block to determine the concentration of reachable lead, that we requested in the February 26, 2003 letter, we asked you to perform the test on one block per shipment of SBM received. In a followup call to Karen Hale and I, you stated that frequency of testing would be cost prohibitive and you agreed to propose an alternative sampling frequency. You have not provided such an alternative sampling frequency to date. Please provide that proposal in writing as soon as possible.

Mr. Ray Williams
US Technology Corporation, Inc.
April 22, 2003
Page 3

If you have any questions, please call me at (614) 644-2950.

Sincerely,



Jeffrey M. Mayhugh, Supervisor
Regulatory Services Unit
Regulatory and Information Services
Division of Hazardous Waste Management

G:\USERS\JMAYHUGH\LETTERS\ustechwilliamsclarify4.22.2003.wpd

cc: Todd Anderson, Legal
Niall McKenna, DHWM, NEDO
Natalie Oryskewych, DHWM, NEDO
Craig Butler, Director's Office
Mike Cunningham, U.S.EPA, Region 5



State of Ohio Environmental Protection Agency
Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

May 1, 2003

RE: **U.S. TECHNOLOGY CORPORATION**
OHD 046 631 743
STARK COUNTY
NOV

Raymond Williams
U.S. Technology Corporation
1446 W. Tuscarawas Street
Canton, OH 44702

CERTIFIED MAIL

Dear Mr. Williams:

Thank you for your January 17, 2003 response to my December 17 and 20, 2002 Notice of Violation (NOV) letters. The response also included information requested during the Ohio EPA inspection on January 7, 2003. The documentation that you submitted included the following: (1) List of customers who shipped spent blasting media (SBM) to U.S. Technology Corporation (US Technology) in Canton, Ohio from January 2000 to December 2002; (2) Copies of purchase orders and/or invoices identifying customers of recycled product produced and sold by UST between 2000 and 2002; (3) Proposed products to be made with SBM and their markets; (4) Current amount of SBM at the Canton, Ohio facility; (5) Verification from a US Technology customer that its SBM would be non-hazardous if not recycled; and, (6) Information on shipments and justification for those shipments to McCallen, Texas, and Reynosa, Mexico.

After reviewing the information submitted, Ohio EPA has determined that US Technology has not recycled 75% of the SBM it has accepted at its facility in Canton, Ohio in 2000, 2001, and 2002. Therefore, Ohio EPA is expanding the ORC 3734.02 (E) and (F) violation cited in Ohio EPA's December 17, 2002 letter to include all SBM received in 2000, 2001, and 2002. This violation was originally cited for SBM that was received at US Technology facility in Canton, Ohio before being transported to Hydromex in Yazoo, Mississippi. Ohio EPA made this interpretation after reviewing sale information for products made with the SBM in 2000, 2001 and 2002.

The following is an annual summary of US Technology's recycling program:

2000

US Technology accepted 3,133,214 lbs of SBM in 1999. US Technology was required to recycle 75% of this amount, or 2,349,910 lbs, in 2000. According to information submitted to Ohio EPA, US Technology sold 47,521 items produced with the SBM which used only 302,913 lbs of SBM. This is well short of the required amount of SBM that was to have been recycled.

US Technology did transport 2,475,679 lbs of SBM to Hydromex; however, it was never recycled.

2001

US Technology accepted 3,639,274 lbs of SBM in 2000, US Technology was required to recycle 75% of this amount or 2,729,456 lbs in 2001. According to information submitted to Ohio EPA, US Technology sold 19,716 items produced with the SBM which used only 98,632 lbs of SBM. This is well short of the required SBM that was to have been recycled.



Raymond Williams
U.S. Technology Corporation
May 1, 2003
Page 2

US Technology did transport 8,788,323 lbs to Hydromex, however, it was never recycled.

2002

US Technology accepted 4,312,934 lbs of SBM as of November 30, 2001, US Technology was required to recycle 75% of this amount or 3,234,701 lbs in 2002. According to information submitted to Ohio EPA, US Technology sold 15,749 items which used 335,630 lbs of SBM. This is well short of the required SBM that was to have been recycled.

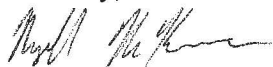
US Technology did transport 3,042,976 lbs of SBM to Hydromex, however, it was never recycled.

It is important to note that US Technology has proposed a SBM recycling program to Ohio EPA where SBM would be used as an ingredient to manufacture split face block. Ohio EPA has evaluated the proposal and in letters dated February 26 and April 22, 2003, recognized that the SBM would not be a hazardous waste per OAC rule 3745-51-02(E)(1). In order for the continued exclusion of the SBM from the definition of waste under Ohio's hazardous waste rules, US Technology needs to maintain and readily demonstrate that:

- (1) the SBM is managed and used in the manner US Technology proposed, and
- (2) the SBM recycling program meet the conditions Ohio EPA outlined in its February 26, 2003 letter.

Should you have any questions, please feel free to call me at (330) 963-1272. You can find copies of the rules and other information on the Division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Nyall McKenna
Environmental Specialist
Division of Hazardous Waste Management

NM:cl

ec: Natalie Oryshkewych, DHWM, NEDO

cc: Tammy McConnell, DHWM, CO
Jeff Mayhugh, DHWM, CO
Harry Sarvis, DHWM, CO
Michael Cunningham, USEPA, Region 5, Office of RCRA (HRE-8J)
Steve Bailey, Mississippi DEQ, Environmental Compliance and Enforcement Division

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.



State of Ohio Environmental Protection Agency

Northeast District Office

10 E. Aurora Road
Cincinnati, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

December 20, 2002

RE: U.S. TECHNOLOGY CORP
OHD 046 631 743
STARK COUNTY

CERTIFIED MAIL

Raymond Williams
U.S. Technology Corporation
1446 W. Tuscarawas Street
Canton, OH 44702

Dear Mr. Williams:

On December 17, 2002, Ohio EPA issued a letter to U.S. Technology. This letter requested information regarding US Technology Corporation's recycling program. In addition to the information already requested, Ohio EPA requests that U.S. Technology submit the following information:

The quantity of spent blasting media shipped from US Technology's facility in Canton, Ohio to Hydromex in Yazoo, Mississippi from 2000 to the present. If US Technology shipped the spent blasting media to a destination other than Hydromex in Yazoo, Mississippi, identify the receiving facility and the quantity of waste shipped to that facility.

Please send the above requested information to my attention at the Ohio EPA within thirty days of the date of this letter. Should you have any questions, please feel free to call me at (330) 963-1272. You can find copies of the rules and other information on the Division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,

NM:cla

Nyall McKenna
Environmental Specialist
Division of Hazardous Waste Management

cc: Tammy McConnell, DHWM, CO
Jeff Mayhugh, DHWM, CO
Harry Sarvis, DHWM, CO
Michael Cunningham, USEPA, Region 5, Office of RCRA (HRE-8J)
Steve Bailey, Mississippi DEQ, Environmental Compliance and Enforcement Division

ec: Natalie Oryshkewych, DHWM, NEDO



State of Ohio Environmental Protection Agency

Northeast District Office

J E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

December 17, 2002

RE: U.S. TECHNOLOGY CORPORATION
OHD 046 631 743
STARK COUNTY
NOV

Raymond Williams
U.S. Technology Corporation
1446 W. Tuscarawas Street
Canton, OH 44702

CERTIFIED MAIL

Dear Mr. Williams:

On April 17, 2002, Ohio EPA and The United States Environmental Protection Agency (US EPA) Region 5 conducted an inspection of U.S. Technology Corporation's (US Technology) facility in Canton, Ohio. At that time, Ohio EPA learned that while US Technology was manufacturing products from the spent blasting media at its facility, US Technology was also shipping the majority of the spent blasting media to Hydromex, Inc. (Hydromex) in Yazoo, Mississippi. US Technology stated that it had licensed Hydromex to use this material to manufacture 18"x18"x48" blocks and revetment mats for levy projects with the Army Corps of Engineers. Subsequently, Ohio EPA received further information from U.S. Technology, US EPA and the Mississippi Department of Environmental Quality (Mississippi DEQ) that hazardous waste spent blast media was being applied directly to the land as well as used in concrete pads being poured at the Hydromex facility. Based upon the sum of information provided to Ohio EPA, we find the following violation(s) of Ohio's hazardous wastes laws:

***Unpermitted Hazardous Waste Facility
(Ohio Revised Code (ORC) §3734.02 (E) and (F))***

US Technology established and operated an unpermitted hazardous waste storage facility and caused the unlawful transportation of hazardous waste to an unpermitted hazardous waste facility. US Technology received and stored hazardous waste (spent blast media) from off-site hazardous waste generators. This hazardous waste was then shipped to Hydromex - Yazoo, Mississippi. At Hydromex, the hazardous waste was placed into the ground and used in a manner which constitutes disposal. The hazardous waste was applied directly to the land and used to make concrete pads. According to information Ohio EPA received from US EPA and Mississippi DEQ, Hydromex is reported to have accepted over 11,000,000 lbs (25,273 drums and 2,156 super sacks) of spent blasting media from January 1, 2001, until June 8, 2002, from US Technology's facility in Canton, Ohio. Hydromex disposed or used in a manner constituting disposal 7,404,664 lbs. of spent blasting media in 2001. Additionally, Mississippi DEQ issued a cease and desist order in which Mississippi DEQ determined Hydromex is operating a hazardous waste treatment, storage, and disposal facility without the permit or permits required by federal and state law.

Any additional spent blast media accepted by US Technology or spent blast media currently being stored at US Technology will be/is considered a hazardous waste unless US Technology can demonstrate that it will be recycled in a lawful manner.



Furthermore, US Technology must supply to Ohio EPA the following information:

1. A list of customers who have shipped its spent blasting media to your Canton, Ohio facility from January 2000 to the present.
2. Copies of purchase orders for products produced and sold by US Technology for 2000 to 2002. Purchase Orders shall contain the name, address and phone number of the companies that have purchased these products.
3. Copies of purchase orders for products produced and sold by US Technology for 2001 and 2002. Purchase Orders shall contain the name, address and phone number of the companies that have purchased these products.
4. Description of products and markets the products will serve for any product currently manufactured or under development in addition to your proposed use as an ingredient in concrete block. Please include information on how these products are manufactured, amount of spent blasting media that is or will be contained in each product, and ingredients other than the spent blasting media.
5. Current amount of spent blasting media being stored at the Canton, Ohio US Technology facility.

Please send all the above requested information to my attention at the Ohio EPA within thirty days of the date of this letter. Should you have any questions, please feel free to call me at (330) 963-1272. You can find copies of the rules and other information on the Division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Nyall McKenna
Environmental Specialist
Division of Hazardous Waste Management

NM:ddw

ec: Natalie Oryshkewych, DHWM, NEDO
cc: Tammy McConnell, DHWM, CO
Jeff Mayhugh, DHWM, CO
Harry Sarvis, DHWM, CO
Michael Cunningham, USEPA, Region 5, Office of RCRA (HRE-8J)
Steve Bailey, Mississippi DEQ, Environmental Compliance and Enforcement Division

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State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
122 S. Front Street
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

December 10, 2002

Ray Williams
US Technology Corporation
1446 West Tuscarawas Street
Canton, Ohio 44702

**RE: Use of Spent Blast Media as an Ingredient to Make
Concrete Masonry Blocks**

Dear Mr. Williams:

We would like to thank John Sciarretti for meeting with Jeff Mayhugh and me to discuss US Technology Corporation's hazardous waste recycling proposal to use spent blast media (SBM) as an ingredient in the making of concrete masonry block. Mr. Sciarretti asked what process and product information Ohio EPA needs to evaluate in order to render an opinion on whether your hazardous waste recycling proposal would be considered legitimate recycling of a hazardous waste. Also, this letter addresses many of the hazardous waste recycling issues discussed in the meeting you had with the Agency on November 21, 2002. Below, I have listed the information we need to evaluate in order to determine the legitimacy of the use of SBM in the making of concrete masonry blocks.

It is our understanding that US Technology wants to use SBM contaminated with paint chips as an ingredient to make concrete masonry blocks. The SBM will be used as a substitute for lightweight aggregate. The SBM may fail the hazardous waste toxicity characteristic due to metals contained in the paint. The abrasive media in SBM may include plastic, glass bead, glass frit, garnet, aluminum oxide, and/or starblast. US Technology is currently developing the concrete masonry block and using the development and testing resources available at the American Concrete Institute in Michigan.

As Jeff and I explained during the meeting with Mr. Sciarretti, the evaluation of a hazardous waste recycling scenario is a two part evaluation. First, we evaluate whether the proposed recycling of the secondary material is a legitimate use of the material. If it is, then we determine whether the material would still be defined as a hazardous waste when recycled.

Bob Taft, Governor
Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director

US Technology Corporation
December 10, 2002
Page 2 of 4

A hazardous secondary material is not defined as a hazardous waste if it is recycled by being used as an ingredient in an industrial process to make a product (provided the materials are not being reclaimed). However, this exemption is voided and the secondary material is defined as a hazardous waste and subject to regulation if the product produced is used in a manner constituting disposal as defined in Ohio Administrative Code (OAC) rule 3745-58-30 (or as amended OAC rule 3745-266-20).

A hazardous secondary material is used in a manner constituting disposal when it or any component of the original waste is incorporated into a product that is placed or applied to the land and that is the product's final intended disposition. Examples of such use include using the concrete masonry block to build structural foundations or slope containment walls.

U.S. EPA clearly stated in the preamble discussion to the final Definition of Solid Waste rule, 50 FR 627, January 4, 1985, its jurisdiction over all hazardous secondary materials and hazardous waste derived products. In part, U.S. EPA stated: "The Agency is thus asserting jurisdiction over all hazardous secondary materials and over products that contain these wastes, when they are applied to the land. Thus, fertilizers, asphalt, and building foundation materials that use hazardous wastes as ingredients and are then applied to the land are subject to RCRA jurisdiction."

A hazardous secondary material legitimately used in a manner constituting disposal is defined as a hazardous waste at the point of generation. Therefore, the handling, transportation and storage of the recyclable hazardous waste is governed by the hazardous waste rules. If the hazardous waste is sent off-site for recycling, the owner/operator of the receiving facility will need to obtain a hazardous waste permit for the storage of the hazardous waste prior to recycling.

In order to render an opinion on the legitimacy of your hazardous waste recycling proposal, we need to evaluate information regarding the recycling process and the concrete masonry block produced. Please provide as much information as possible pertaining to the following questions and requests.

Spent Blast Media:

1. What is the makeup of SBM? Please provide a detailed chemical and physical analysis of each component of each type of SBM to be used in making concrete masonry block. The description needs to include the total concentration and leachate levels of toxic heavy metals in each SBM, and the particle size of the paint chips and each type of abrasive media.
2. Please provide a chemical and physical analysis of each of the commercial ingredients normally used in making the concrete masonry blocks. In addition,

US Technology Corporation
December 10, 2002
Page 3 of 4

provide the recipe of commercial ingredients, on weight by weight basis, that is used to make commercially available concrete masonry blocks intended for the same use(s) as the waste derived blocks.

3. Explain why and how each type of SBM is an effective substitute for lightweight aggregate in the making of concrete masonry block. The explanation should compare and contrast the physical and chemical characteristics of each type of SBM and lightweight aggregate.
4. Please describe the recycling process including the makeup of the SBM mixture used as an ingredient, the recipe, necessary equipment and curing method.
5. Please describe the different ingredient mixtures tested by US Technology in developing the blocks that were not selected as the final recipe. This description needs to explain why the mixtures were rejected; test data should also be submitted, if available.
6. Explain why and how each of the components of SBM (i.e., the abrasive media, paint resin and heavy metals) are necessary and useful in the making of the concrete masonry blocks.
7. Do the components of SBM improve or enhance a specific characteristic of the concrete masonry block as compared to blocks made solely of commercial ingredients? Please explain the improved/enhanced characteristic and why it's important. In addition, provide empirical data you have on actual product that substantiates the claim that the abrasive media, heavy metals and/or paint resins are incorporated and part of the chemical bonds of the matrix of the concrete (e.g., thin section examination).
8. What chemical and physical specifications must each type of SBM meet in order for it to be used as an effective ingredient in the making of concrete masonry blocks? Please explain why these specifications are important.

Concrete Block:

9. Describe the concrete masonry block produced and the intended use(s) of the concrete masonry block.
10. Please list US Technology's specifications for the concrete masonry blocks specific for each of their intended uses and the corresponding ASTM standard, if applicable.
11. Please provide analytical data demonstrating the total concentrations and leachable

US Technology Corporation
December 10, 2002
Page 4 of 4

amounts of the heavy metals lead, cadmium and chromium in the concrete masonry blocks using the Toxicity Characteristic Leaching Procedure, Method 1311 in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, U.S. EPA publication SW-846 and the Synthetic Precipitation Leaching Procedure, Method 1312 in SW-846. Also, please include laboratory quality assurance and quality control (QA/QC) information.

12. What is the name(s) of the laboratory that performed the testing on the concrete masonry blocks? Is the laboratory(ies) accredited? What accreditations do they hold?
13. To whom does US Technology intend to market the concrete masonry blocks? Please provide purchase contracts and/or documentation of third party interest in purchasing the blocks.

If you submit information to Ohio EPA that you consider confidential business information and wish to have it withheld from the public, you must make a confidentiality request to Ohio EPA in accordance with OAC rule 3745-50-30. Each request for confidentiality needs to be submitted simultaneously with the specific information (e.g., formula, plan, pattern, process, or compound) and be accompanied by documentation that demonstrates that the specific information meets the definition of "trade secret" in OAC rule 3745-50-30(E).

Please find enclosed with this letter a copy of OAC rule 3745-50-30. Also, please submit a redacted copy of your information where you have removed the trade secret information from the documents. This copy will be available for public review.

If you have any questions about the information Ohio EPA is requesting, please do not hesitate to contact me or Jeff Mayhugh by telephone at (614) 644-2977.

Sincerely,



Karen L. Hale
Environmental Specialist 3
Regulatory Services Unit
Division of Hazardous Waste Management

KLH/USTechUCD.wpd

cc: Nyall McKenna, NEDO, DHWM
Harry Sarvis, CO, DHWM
Todd Anderson, Legal

Natalie Oryshkewych, NEDO, DHWM
Craig Butler, DO



June 17, 2002

Ohio E.P.A.
Mr. Nyall McKenna
North East District Office
Division of Hazardous Waste Management
2110 E. Aurora Rd.
Twinsburg, Ohio 44087-1969

Dear Mr. McKenna,

On May 21, 2002 your office issued a letter following inspection at our Canton, Ohio facility. In that letter you posed seven (7) questions, which we will answer here.

OAC rule 3745-51-01 (C) (8) states "...a material is not accumulated speculatively if the person accumulating the material can show that the material is potentially recyclable and has a feasible means of being recycled; and that during the calendar year, commencing January first, the amount of material that is recycled, or transferred to a different site for recycling equals at least seventy-five percent by weight or volume of the amount of that material accumulated at the beginning of the calendar year."

Hydromex Inc. of Yazoo, Mississippi is a recognized recycler, overseen by the Department of Environmental Quality of Mississippi.

1) Hydromex Inc. manufactures products in addition to blocks. Enclosed is the yearend production calculation provided to the State of Mississippi. Per the attached meeting review letter, the various products, production, markets and composition have been reviewed with the cognizant government representatives having authority over the Mississippi Recycler.

2) Blocks produced by Hydromex are cast in molds. The owners of Hydromex Inc. and its officers have assured the MDEQ and myself that they have no ownership or other interest in Holloway Company or the Oil City/Grupp Levy project.

3) Hydromex Inc. is paying U.S. Technology zero for the first year and beginning January 1, 2002 is paying \$8.00 per ton.

4) Enclosed are TCLP results from spent blasting media and finished product from the spent blasting media which results were provided by Hydromex Inc. to the MDEQ who have authority over their facility

5) The letter from L.T. Associates provided along with the May 3, 2002 U.S. Technology letter was to clarify the items included in the original order dated November 12, 2001. The letter was written around May 3, 2002. The quantity of items purchased by L.T. Associates thus far in 2002 was 3,529. Remaining at U.S. Technology is the following:

| | |
|--|-------------|
| Sold to L.T. Assoc. and not shipped yet: | 1,305 Items |
| Sold to others and awaiting pick-up: | 220 Items |
| Being retained for Park System: | 53 Items |
| Items not sold or committed to use: | -0- Items |

6) U.S. Technology Corporation has NO products made from spent blasting media at locations other than 1446 W. Tuscarawas Street.

7) The final product benefits from the inclusion of the heavy metals in several ways. In the Granitelike™ products they enhance compressive strength and increase setting times. In the Marblike™ products they promote catalization. In both products the same heavy metal pigments found in the fill are normally added to the final product to achieve color; only in much higher concentrations than is present in the spent media fill.

Respectively Submitted,

US Technology Corporation



Raymond F. Williams
President

HYDROMEX, INC. RECYCLED MEDIA LBS.

| A | B | C | D | E |
|------------------------|--|---------------|----------------|-------------------------------------|
| 2000 Beginning Balance | 2000 Required Reduction (A X .75) = B | 2000 Received | 2000 Reduction | 2000 Remaining on Hand A+C-D = E |
| - | - | 2,475,679 | - | 2,475,679 |
| A | B | C | D | E |
| 2001 Beginning Balance | 2001 Required Reduction (A X .75) = B | 2001 Received | 2001 Reduction | 2001 Remaining on Hand A+C-D = E |
| 2,475,679 | 1,856,759 | 9,835,639 | 6,414,396 | 5,896,922 |

\$0

3.00 mil.

NOTE: 2001 RECEIVED INCLUDES 1,467,161 OF NON HAZZARDOUS LBS
RECEIVED FROM UST.

**HYDROMEX
PRODUCTION/INVENTORY
2001**

| | <u>2000</u> | <u>2001</u> |
|---------------------|------------------|------------------|
| Beginning Balance | - | 2,475,679 |
| Shipped to Hydromex | | |
| Hazz | 2,475,679 | 8,368,478 |
| Nonhazz | | <u>1,467,161</u> |
| total | | <u>9,835,639</u> |
| Hydromex Production | - | (6,414,396) |
| Ending Balance | <u>2,475,679</u> | <u>5,896,922</u> |

Hydromex Production

| | <u>Total Units</u> | <u>Spent Media lbs/unit</u> | <u>Spent Media Recycled</u> |
|-------------------------|------------------------|---------------------------------|---------------------------------|
| Super Blocks | 1,086 | 546 | 592,956 |
| Storage Pads (cu yards) | 2,865 | 2,025 | 5,780,661 |
| "O" Blocks | 7 | 546 | 3,822 |
| Revetments | <u>23</u> | <u>1,607</u> | <u>36,956</u> |
| | <u>3,971</u> | | <u>6,414,396</u> |

May 31, 2002

**Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385**

Attn: Mr. David Lee, P.E.

Dear Mr. Lee,

Thank you for your time and consideration on the May 29, 2002 meeting at MDEQ Jackson, MS. In attendance at the meeting was yourself, Mr. Steven Bailey, and Mr. J. Earl Mahaffey of MDEQ, Gene Pridemore of Hydromex, Pat Ramsey – property owner, Ray Williams and John Sciarretti of U.S. Technology – Material Supplier.

The purpose of the meeting was to review the recycle operations of Hydromex, Inc. at Yazoo, MS. and update MDEQ on production and products.

Summary numbers were presented covering 2000 and 2001 of pounds received and pounds produced exhibiting conformance with speculative accumulation requirements for those years.

Gene Pridemore described the manufacture of and present customer for Super Block and scheduled delivery to Holloway Construction. He also described the production and sale of road pads to Mr. Ramsey who verified their economic benefit. Gene Pridemore also described the manufacture of 16 X 32 block construction materials and their intent to build a model home to promote sales. Photographs of a small block model home from The Philippine's Hydromex production was shown. Gene Pridemore described a request for production of bass habitat structures that MDEQ said would be considered. Other products under consideration were also discussed.



JUL. 15. 2002

4:42PM

OHIO EPA NEDO

NO. 127

P. 7/11

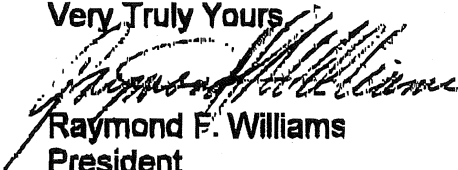
**USTECHNOLOGY
CORPORATION**

Hydromex produced additional TCLP results from recent tests of raw material and finished product from the same raw material showing reduction of heavy metals to below regulatory levels.

Ray Williams discussed an Ohio EPA N.O.V. letter copied to MDEQ, which was subsequently rescinded by Ohio covering questions including Hydromex.

We appreciated your time and continued support of our efforts to recycle in the State of Mississippi.

Very Truly Yours



Raymond F. Williams
President

cc: Steven Bailey - MDEQ
J. Earl Mahaffey - MDEQ
Nyall McKenna - NEO-EPA
Gene Pridemore - Hydromex
Pat Ramsey
John Sciarretti - UST

ARGUS ANALYTICAL, INC.

235 Highpoint Drive
Ridgeland, Mississippi 39157
Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited
LELAP 04023

To: Hydromex, Inc.
PO Box 1514
Yazoo City, MS 39194

ATTN: Gene Pridemore

Project ID/Location: Metals Analysis

Sample Description: 11794325P Powder

Sample Matrix: SOLID

Date Reported: 04/19/02

Date Sampled:

Time Sampled:

Sampled by: Client

Date Received: 04/11/02

Project Number:

Sample Number: BB28657

Page Number: 1

| Parameter | Result | Det Limit | Reg Limit | Units | Method | Analyst | Date |
|--------------------|--------|-----------|-----------|-------|--------|---------|----------|
| TCLP Metals | | | | | | | |
| Arsenic, TCLP | ND | 0.05 | 5 | mg/L | 200.7 | BTH | 04/18/02 |
| Barium, TCLP | 1.30 | 0.01 | 100 | mg/L | 200.7 | BTH | 04/18/02 |
| Cadmium, TCLP | 0.24 | 0.02 | 1 | mg/L | 200.7 | BTH | 04/18/02 |
| Chromium, TCLP | 16.9 | 0.05 | 5 | mg/L | 200.7 | BTH | 04/18/02 |
| Lead, TCLP | ND | 0.05 | 5 | mg/L | 200.7 | BTH | 04/18/02 |
| Mercury, TCLP | ND | 0.0002 | .2 | mg/L | 7470 | RAH | 04/17/02 |
| Selenium, TCLP | ND | 0.05 | 1 | mg/L | 200.7 | BTH | 04/18/02 |
| Silver, TCLP | ND | 0.005 | 5 | mg/L | 200.7 | BTH | 04/18/02 |


ND = Not Detected NC = Not Corrosive

Reg Limits apply to TCLP only;

Reg Limit of "0" indicates not applicable.

Acceptable range for Corrosivity (pH) = 2.0-12.5


Quality Assurance/Quality Control


B. G. Giessner, Ph.D.

ARGUS ANALYTICAL, INC.

235 Highpoint Drive

Ridgeland, Mississippi 39157

Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited

NELAP 04023

To: Hydromex, Inc.
PO Box 1514
Yazoo City, MS 39194

ATTN: Gene Pridemore

Date Reported: 04/19/02

Date Sampled:

Time Sampled:

Sampled by: Client

Date Received: 04/11/02

Project Number:

Project ID/Location: Metals Analysis

Sample Description: 11794325C Core

Sample Number: BB28658

Sample Matrix: SOLID

Page Number: 1

| Parameter | Result | Det Limit | Reg Limit | Units | Method | Analyst | Date |
|--------------------|--------|-----------|-----------|-------|--------|---------|----------|
| TCLP Metals | | | | | | | |
| Arsenic, TCLP | ND | 0.05 | 5 | mg/L | 200.7 | BTH | 04/18/02 |
| Barium, TCLP | 1.03 | 0.01 | 100 | mg/L | 200.7 | BTH | 04/18/02 |
| Cadmium, TCLP | ND | 0.02 | 1 | mg/L | 200.7 | BTH | 04/18/02 |
| Chromium, TCLP | 1.62 | 0.05 | 5 | mg/L | 200.7 | BTH | 04/18/02 |
| Lead, TCLP | ND | 0.05 | 5 | mg/L | 200.7 | BTH | 04/18/02 |
| Mercury, TCLP | ND | 0.0002 | .2 | mg/L | 7470 | RAH | 04/17/02 |
| Selenium, TCLP | ND | 0.05 | 1 | mg/L | 200.7 | BTH | 04/18/02 |
| Silver, TCLP | ND | 0.005 | 5 | mg/L | 200.7 | BTH | 04/18/02 |

ND = Not Detected NC = Not Corrosive

Reg Limits apply to TCLP only;

Reg Limit of "n" indicates not applicable.

Acceptable range for Corrosivity (pH) = 2.0-12.5


Quality Assurance/Quality Control
B. G. Giesner, Ph.D.

101pr02

ARGUS ANALYTICAL, INC.

235 Highpoint Drive

Ridgeland, Mississippi 39157

Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited

LELAP 04023

To: Hydromex, Inc.
PO Box 1514
Yazoo City, MS 39194

ATTN: Gene Pridemore

Project ID/Location: Metals Analysis

Sample Description: 13534329C Core

Sample Matrix: SOLID

Date Reported: 05/09/02

Date Sampled: 04/02/02

Time Sampled:

Sampled by: Client

Date Received: 05/02/02

Project Number:

Sample Number: BB29675

Page Number: 1

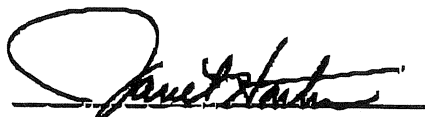
| Parameter | Result | Det Limit | Reg Limit | Units | Method | Analysts | Date |
|--------------------|--------|-----------|-----------|-------|--------|----------|----------|
| TCLP Metals | | | | | | | |
| Arsenic, TCLP | ND | 0.05 | 5 | mg/L | 200.7 | BTH | 05/09/02 |
| Barium, TCLP | 0.92 | 0.01 | 100 | mg/L | 200.7 | BTH | 05/09/02 |
| Cadmium, TCLP | ND | 0.02 | 1 | mg/L | 200.7 | BTH | 05/09/02 |
| Chromium, TCLP | 3.77 | 0.05 | 5 | mg/L | 200.7 | BTH | 05/09/02 |
| Lead, TCLP | ND | 0.05 | 5 | mg/L | 200.7 | BTH | 05/09/02 |
| Mercury, TCLP | ND | 0.0002 | 2 | mg/L | 7470 | RAH | 05/09/02 |
| Selenium, TCLP | ND | 0.05 | 1 | mg/L | 200.7 | BTH | 05/09/02 |
| Silver, TCLP | ND | 0.005 | 5 | mg/L | 200.7 | BTH | 05/09/02 |

ND = Not Detected NC = Not Corrosive

Reg Limits apply to TCLP only;

Reg Limit of "0" indicates not applicable.

Acceptable range for Corrosivity (pH) = 2.0-12.5



Quality Assurance/Quality Control



B. G. Giesner, Ph.D.

telpr02

ARGUS ANALYTICAL, INC.

235 Highpoint Drive

Ridgeland, Mississippi 39157

Telephone: 601/957-2676 FAX: 601/957-1887

NELAP Accredited

LAB 04023

To: Hydromex, Inc.
PO Box 1514
Yazoo City, MS 39194

ATTN: Gene Pridemore

Project ID/Location: Metals Analysis

Sample Description: 13534329P Powder

Sample Matrix: SOLID

Date Reported: 05/09/02

Date Sampled: 04/02/02

Time Sampled:

Sampled by: Client

Date Received: 05/02/02

Project Number:

Sample Number: BB29674

Page Number: 1

| Parameter | Result | Det Limit | Reg Limit | Units | Method | Analysts | Date |
|--------------------|--------|-----------|-----------|-------|--------|----------|----------|
| TCLP Metals | | | | | | | |
| Arsenic, TCLP | ND | 0.05 | 5 | mg/L | 200.7 | BTH | 05/09/02 |
| Barium, TCLP | 0.97 | 0.01 | 100 | mg/L | 200.7 | BTH | 05/09/02 |
| Cadmium, TCLP | 9.56 | 0.02 | 1 | mg/L | 200.7 | BTH | 05/09/02 |
| Chromium, TCLP | 16.8 | 0.05 | 5 | mg/L | 200.7 | BTH | 05/09/02 |
| Lead, TCLP | 0.16 | 0.05 | 5 | mg/L | 200.7 | BTH | 05/09/02 |
| Mercury, TCLP | ND | 0.0002 | .2 | mg/L | 7470 | RAH | 05/09/02 |
| Selenium, TCLP | ND | 0.05 | 1 | mg/L | 200.7 | BTH | 05/09/02 |
| Silver, TCLP | ND | 0.005 | 5 | mg/L | 200.7 | BTH | 05/09/02 |


ND = Not Detected NC = Not Corrosive

Reg Limits apply to TCLP only;

Reg Limit of "0" indicates not applicable.

Acceptable range for Corrosivity (pH) = 2.0-12.5


Quality Assurance/Quality Control


B. G. Giesinger, Ph.D.



State of Ohio Environmental Protection Agency
Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

May 21, 2002

RE: US TECHNOLOGY CORP.
STARK COUNTY
OHD 046 631 743
NOV-CESQG

Raymond Williams
US Technology Corporation
1446 W. Tuscarawas Street
Canton, OH 44702

Dear Mr. Williams:

Ohio EPA conducted a hazardous waste inspection at the US Technology Corp. facility located at 1446 W. Tuscarawas Street on April 17, 2002. The purpose of the inspection was to evaluate US Technology Corporation's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). During the inspection, Mike Cunningham represented the USEPA; John Sciarretti, Jack Synder and Donna Torrie represented US Technology Corp.; and I represented Ohio EPA.

In previous visits and phone conversations with US Technology Corp., Ohio EPA learned that US Technology Corp. produces a blasting media which is used by its customers to remove coatings from metal in blasting/stripping operations. A typical customer might be an air force base who would use this material to remove paint from an airplane. Because of its heavy metal content, the spent blasting media is considered a hazardous waste if not recycled. The majority of the spent blasting media is shipped back to US Technology Corp.'s Canton facility to be used in its recycling program with the remaining disposed in either a hazardous or solid waste landfill. US Technology Corp. takes the spent blasting media and makes products out of it including outdoor patio furniture, planters, bird baths, lazy Susans, dog bowls, and a variety of other products.

During this inspection, Ohio EPA learned that in June 2001, US Technology Corp. licensed Hydromex, Inc. to use this material at their facility in Yazoo, Mississippi, where the plastic is used to produce 18"x18"x48" blocks of plastic. These blocks weight about 700 lbs. each and are to be used on the Oil City/Crupp Levy. Currently, the majority of the spent blasting media is shipped directly from the generator to Hydromex, Inc.

At Ohio EPA's request, US Technology Corp. provided the end of the year numbers during the inspection which show quantities of spent plastic received and recycled during 2001. According to US Technology Corp. in calendar year 2001, US Technology Corp. had 4,222,498 lbs. of spent blasting media on-site January 1, 2001. US Technology Corp. is required to recycle at least 75% of the hazardous waste it receives in order for this hazardous waste to be exempt from Ohio EPA's hazardous waste rules, in this case 3,166,873 lbs. According to your records, US Technology Corp. recycled 8,448,478 lbs. of the spent blasting media in 2001.



US TECHNOLOGY CORP.
MAY 21, 2002
PAGE - 2 -

As a result of the inspection, phone conversations with Ray Williams, phone conversations with David Lee with the Mississippi DEQ, and correspondence received on May 6, 2002 from US Technology Corp.; Ohio EPA has found the following violation:

**Definition of Waste
3745-51-02(F)**

"Respondents... who raise a claim that a certain material is not a waste, or is conditionally exempt from regulation, must demonstrate that there is a known market or disposition for the material and that they meet the terms of the exclusion or exemption. In doing so, they must provide appropriate documentation to demonstrate that the material is not a waste, or is exempt from regulation."

Ohio EPA has found US Technology Corp. operating a recycling operation that does not produce a marketable product and is, therefore, not in compliance with Ohio EPA's hazardous waste rules and regulations. US Technology Corp.'s must address these six concerns Ohio EPA has with US Technology Corp. spent blasting media recycling program if this violation is to be rescinded. This information must be sent within 30 days of receiving this letter.

1. According to your records, 8,448,478 lbs. of spent blasting media was recycled in 2001; a 255% increase over the previous year's 3,301,983 lbs. recycled. This comes as a surprise since Hydromex, Inc. has only produced 2400 blocks at the time of the inspection which used only about 1,176,000 lbs of material (each block contains 70% of spent blasting media + 30% resin). Please submit information on the products manufactured and quantity of each product made during 2001 from the 8,448,478 lbs of spent blasting media that was recycled.
2. How are the blocks produced by Hydromex, Inc. to be used on the levy? Does Hydromex, Inc. or the owners of Hydromex, Inc. have any personal or financial interest in Holloway Construction or the Oil City/Crupp Levy project that the blocks are to be used for?
3. According to your records, Holloway Construction is paying \$10.00 for each block. How much money is Hydromex, Inc. paying US Technology Corp. for the spent blasting media that is used to make each block?
4. Ohio EPA would like sampling results from sampling done on the spent blasting media and on the finished products produced from the spent blasting media.

US TECHNOLOGY CORP.
MAY 21, 2002
PAGE - 3 -

5. US Technology Corp. has submitted a letter from L.T. Associates, Inc. which states that it is purchasing all remaining Marblelike planters and fountains. What is the date of this letter? What is the total quantity of items purchased in 2002 by L.T. Associates, Inc.? How much of the Marblelike outdoor products still remain which have been purchased but not yet shipped? How much has not been purchased?
6. Does US Technology Corp. have any products made from the spent blasting media stored at a location other than 1446 Tuscarawas Street.
7. How does the final product benefit from the heavy metals in the spent blasting media.

Should you have any questions, please feel free to call me at (330) 963-1272. You can find copies of the rules and other information on the Division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Nyall McKenna
Environmental Specialist
Division of Hazardous Waste Management

NM:ddw

ec: Natalie Oryshkewych, DHWM, NEDO
cc: Tammy McConnell, DHWM, CO
Jeff Mayhugh, DHWM, CO
Michael Cunningham, USEPA, Region 5, Office of RCRA (HRE-8J)
David Lee, Mississippi DEQ, Timber Branch, Compliance Division

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.



State of Ohio Environmental Protection Agency
Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

May 28, 2002

RE: US TECHNOLOGY CORP.
STARK COUNTY
OHD 046 631 743
NOV-CESQG

Raymond Williams
US Technology Corporation
1446 W. Tuscarawas Street
Canton, Ohio 44702

Dear Mr. Williams:

I sent you a Notice of Violation (NOV) letter on May 21, 2002, specifying the violation of Ohio Administrative Code (OAC) rule 3745-51-02(F) observed during Ohio EPA's April 17, 2002, site visit. On May 23, 2002, you and I had a phone conversation in which information was presented which was not available at the time of the inspection. Ohio EPA is rescinding the violation of OAC 3745-51-02(F). However, US Technology must still address the seven concerns outlined in the May 21, 2002, letter by June 23, 2002.

Should you have any questions, please feel free to call me at (330) 963-1272. You can find copies of the rules and other information on the Division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,

Nyall McKenna
Environmental Specialist
Division of Hazardous Waste Management

NM:bo

enclosures

ec: Natalie Oryshkewych, DHWM, NEDO

pc: Tammy McConnell, DHWM, CO
Jeff Mayhugh, DHWM, CO
Michael Cunningham, USEPA, Region 5, Office of RCRA (HRE-8J)
David Lee, Mississippi DEQ, Timber Branch, Compliance Division

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.



April 17, 2002

U.S. Technology

1446 W. Tuscarawas Street
Canton, Ohio 44702

Ohio EPA: Nyall McKenna

US Technology: John Sciarretti (Vice President), Jack Snyder (General Manager), Donna Torrie

USEPA: Michael Cunningham (USEPA - Region 5)

Purpose: RCRA inspection

Arrived onsite and introduced ourselves. Taken to a conference room where Ray Williams, President of US Technology, was on the phone. He was calling from an air force base somewhere in the south. I told Ray we were there to get information on the recycling spent blasting media program and end of year numbers, plus we were conducting a site inspection of the manufacturing process. Ray said his staff will give us the end of year numbers on how much US Technology has recycled in 2001. He stated further that US Technology might start up a lawn furniture production line using a new process that he will send me information on. He said he will contact me later in the week to discuss the results of the site visit.

Meet with John Sciarretti (Vice President), Jack Snyder (General Manager), Donna Torrie, and one other individual.

Corporation offices have moved from 220 7th Street S.E. to 1446 Tuscarawas Street. Still use storage silos at the old location.

Making lawn and garden furniture when an order is received and pet bowls which are made on a continuous basis. Pet bowls have been a big seller.

DT gave MC and myself the end of year numbers on how much spent blasting media was recycled. According to the numbers, 8,448,478 lbs of spent blasting media was used to make products. This is a 250% increase over the previous years numbers. I asked where did all the spent media come from. JS stated that some of its customers were not in the recycling program but were sending the spent media to landfills. These customers are now in the program and have found new clients some in the auto sector.

JS stated that the majority of the plastic in the recycling program goes to the Hydromex facility in Yazoo, Mississippi. Some of the plastic in the recycling program will come to the Canton location before being shipped on to Mississippi. Small amount of the plastic used at the facility for the lawn furniture and pet bowls. US Technology trucks do all the shipping.

JS stated that US Technology sells blasting media to companies that use it and dispose of the material in either a solid or hazardous waste landfill. These companies do not participate in US

Technology recycling program.

Hydromex is looking at a joint partnership with a Mexican outfit to use the spent blasting media at a facility in Mexico to make walls for homes for Mexican workers. Mexican authorities are currently evaluating the blasting media.

Hydromex takes the spent blasting media and mixes it with a resin in a mold and then allowed to dry. The end product is a 700 lb block used by contractors working with the Army Corp. of Engineers. These blocks are placed two high on dams and levies. Not sure how many blocks have been made and for who. Not sure how long the contract runs for and how many blocks are needed. Need to talk with Ray Williams to get this information. DT gave MC and myself pictures printed off of a computer showing the plastic blocks stacked.

MS and myself explained in great detail to US Technology what US Technology needs to do in order to be in compliance with US EPA and Ohio EPA hazardous waste rules. I told US Technology that it must make sure that Hydromex and itself uses 75% of the spent plastic media in producing products that sells.

I asked about current production at this location. US Technology have three employees who mix spent blasting media in with resin and pour the mixture into molds that have a gel coat. The mold is allowed to dry and the base portion is sanded down. Make 150 pet bowls a day.

Found pet bowls drying in the molds on a conveyor line. Below the conveyor line there was spilled plastic from filling the pet bowls. Paper had been placed under the line to catch some of the drippings but most of the floor in the production area had the dried plastic drippings. I asked what happens to the line drippings. US Technology stated that the paper is dumped with its solid waste. I told them to stop throwing away the drippings since it is spent blasting media that has not been recycled and to shredded and reuse it. In addition, the floor will need to be scrapped and the plastic recycled.

Only waste found was a superflush used in a machine called the marblematic or pot cleaning machine. This material is non-hazardous.

Continued to walk around the property. Noticed outdoor patio furniture stacked outside between buildings. I remembered seeing the same patio furniture stack a few years back in the location. One could tell by the condition of the pallets that the patio furniture had been there for a few years. At least a hundred pieces stored here. JS stated that he believes all of this has been sold to a liquidator. I asked for a receipt and he said he would find it. I told him I was concerned because there obviously wasn't a market for the furniture since this material has been sitting here for sometime, especially since they want to produce more of it.

Asked JS if there was any more of the outdoor patio furniture and planters in any other warehouse onsite or off. He said no, US Technology isn't storing this material anywhere else.

Walked back to the office and was given two invoices for a sale of 143 pieces of Lion Face

Square for \$ 1,515.80 on March 13, 2002 and 126 pieces of misc. outdoor products for \$1,139.10 to LT Assoc. I asked was the invoice for the material that is currently onsite. JS said he wasn't sure and that Ray Williams might know.

I told JS that US Technology will receive a letter from me in the next two to three weeks.

Ohio EPA and USEPA left the site.



State of Ohio Environmental Protection Agency
Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

FAX Transmittal Sheet

To: Michael Cunningham

Fax Number: (312) 868 353-4342

Subject: U.S. Technology

From: Nyall McKenna

Date: 5-7-02

Pages to Follow: 4
(Include Cover Sheet)

If you have any questions, call (330) 963-1200, ask for sender

Return Fax number (330)487-0769

US TECHNOLOGY CORPORATION

RECYCLED MEDIA LBS.

| A | B | C | D | E |
|----------------------------|--|------------------------------------|----------------|-------------------------------------|
| 1993 Beginning Balance - 0 | 1993 Required Reduction (A X .75) = B | 1993 Received | 1993 Reduction | 1993 Remaining on Hand A+C-D = E |
| 0 | 0 | 76,504 | 1,461 | 75,043 |
| A | B | C | D | E |
| 1994 Beginning Balance | 1994 Required Reduction (A X .75) = B | 1994 Received | 1994 Reduction | 1994 Remaining on Hand A+C-D = E |
| 75,043 | 56,282 | 458,775 | 75,518 | 458,300 |
| A | B | C | D | E |
| 1995 Beginning Balance | 1995 Required Reduction (A X .75) = B | 1995 Received | 1995 Reduction | 1995 Remaining on Hand A+C-D = E |
| 458,300 | 343,725 | 1,196,137 | 359,963 | 1,294,474 |
| A | B | C | D | E |
| 1996 Beginning Balance | 1996 Required Reduction (A X .75) = B | 1996 Received | 1996 Reduction | 1996 Remaining on Hand A+C-D = E |
| 1,294,474 | 970,856 | 1,550,499 | 1,063,368 | 1,781,605 |
| A | B | C | D | E |
| 1997 Beginning Balance | 1997 Required Reduction (A X .75) = B | 1997 Received | 1997 Reduction | 1997 Remaining on Hand A+C-D = E |
| 1,781,605 | 1,336,204 | 2,181,345 | 1,356,326 | 2,606,624 |
| A | B | C | D | E |
| 1998 Beginning Balance | 1998 Required Reduction (A X .75) = B | 1998 Received | 1998 Reduction | 1998 Remaining on Hand A+C-D = E |
| 2,606,624 | 1,954,968 | 2,719,298 | 2,009,064 | 3,316,858 |
| A | B | C | D | E |
| 1999 Beginning Balance | 1999 Required Reduction (A X .75) = B | 1999 Received | 1999 Reduction | 1999 Remaining on Hand A+C-D = E |
| 3,316,858 | 2,487,644 | 3,133,214 | 2,564,865 | 3,885,207 |
| A | B | C | D | E |
| 2000 Beginning Balance | 2000 Required Reduction (A X .75) = B | 2000 Received | 2000 Reduction | 2000 Remaining on Hand A+C-D = E |
| 3,885,207 | 2,913,905 | 3,639,274 | 3,301,983 | 4,222,498 |
| A | B | C | D | E |
| 2001 Beginning Balance | 2001 Required Reduction (A X .75) = B | 2001 Received as of Nov. 30, 01 | 2001 Reduction | 2001 Remaining on Hand A+C-D = E |
| 4,222,498 | 3,166,874 | 4,312,934 | 8,448,478 | 86,954 |